

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 1:22-CR-165
)	Hon. Michael S. Nachmanoff
HATCHET M. SPEED,)	Trial: January 17, 2023
)	
Defendant.)	

DEFENDANT’S PROPOSED JURY INSTRUCTION

Defendant, Hatchet M. Speed, by undersigned counsel, submits the attached proposed jury instruction for inclusion by the Court in its charge to the jury. The defense reserves the right to modify, withdraw, supplement or substitute instructions as may be suggested by the evidence in the case before the charge conference. The defense also reserves the right to supplement these instructions in response to the government’s presentation of its case and/or with an appropriate “Theory of the Defense” instruction prior to the charge conference.

HATCHET SPEED

by counsel:

Jeremy C. Kamens
Federal Public Defender for the
Eastern District of Virginia

by: /s/ _____
Brooke Rupert
VA Bar No. 79729
Assistant Federal Public Defender
1650 King Street, Suite 500

Alexandria, Virginia 22314
Telephone: (703) 600-0800
Facsimile: (703) 600-0880
brooke_rupert@fd.org

Courtney Dixon
Pro hac vice
DC Bar No. 1766415
Assistant Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
Telephone: (703) 600-0800
Facsimile: (703) 600-0880
courtney_dixon@fd.org